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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the matter of:

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations
(Littlefield, Arizona)

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MM Docket 99-282

RM-9710

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COMMENTS OF REC NETWORKS

1. *Overview.* REC Networks ("REC"), through it's wholly owned entity The Arizona Microradio Association ("AzMA") hereby submits the following comments relating to the above captioned proceeding.

2. *Position.* REC/AzMA questions the need for this allotment of an additional channel in Littlefield, AZ for the reasons herein.

3. *The community.* Littlefield is a small community along the very short span of Interstate 15 in Arizona. The Commission was not able to locate the community in the U.S. Census. REC was not able to locate the community name on the Gazetteer¹ but was able to locate the ZIP code 86432 for Littlefield, AZ. The 1990 Census for this ZIP code is declared as 87. This amount is lower than the population mentioned in the Rand McNally Atlas, which is used by the Commission. Based on the information presented, we are inclined to believe that the actual population of Littlefield is 87.

1 - To obtain this information, we used the "Gazetteer" at the United States Census Bureau's web site at <http://www.census.gov>

4. *Vacant allotment in Mesquite, NV.* REC has discovered that there is a vacant allotment on Channel 244C in the nearby community of Mesquite, Nevada². As of October 5, 1999, there has been no applications filed for this channel nor was the channel mentioned in the recent Closed Broadcast Auction. The predicted 70-dBu city-grade contour of the Mesquite allotment covers the entire stretch of Interstate 15 in Arizona, which would include Littlefield³.

5. *Internet search for businesses.* Conducting a search for businesses and other services on the Internet for Littlefield, AZ yielded the following results. Using Yahoo!, we were able to find for "Hidden Valley Preserve" which offers "offering big game hunting including wild boar and mountain lion, fishing, and bird hunting." When we try to access this website, we receive a "forbidden" message⁴. A search of the AltaVista search engine shows that there is also a golf course in Littlefield.

2- MM Docket 97-132, RM-9081. Petition to amend the FM Table of Allotments. The petitioner, Will Kemp, petitioned the Commission to add Channel 244C to the FM Table of Allotments to Mesquite, Nevada as their second aural service. The comment period closed on July 7, 1997 and reply comments closed on July 22, 1997. On December 5, 1997, a Report and Order was issued by the Commission amending the Table of Allotments.

3- Appendix A of this pleading shows the 70 dBu city grade contour as well as the 60 dBu service contour of the vacant allotment in Mesquite, NV.

4- A "forbidden" message is generated by a web server if the privilege attributes (chmod) are set incorrectly. This means that the website is not accessible to the general public.

6. *Availability of LPFM channels.* Running a check on the proposed transmitter site as well as a check on the coordinates listed by the Census Bureau for the ZIP Code 86432 shows that there are a sufficient number of channels available for assignment to Low Power FM stations contingent on rulemaking in MM Docket 99-25.

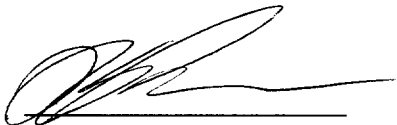
7. *Other FM services in the area.* At the ZIP Code coordinates for Littlefield, we have determined there are several FM stations within the 60dBu-service contour. 3 stations from St. George, UT, 2 stations in Mesquite, NV (including the vacant allotment mention in 4 above) as well as a Non-Commercial Educational translator station in Mesquite.

8. *White Pages search results.* REC/AzMA has checked a major white pages website⁵ searching for any businesses starting with the first world of "Littlefield" and the community of Littlefield, AZ. We have found that many communities with a significant amount of local commerce will have several businesses, which begin with the city name. The result of our search shows that the only business listed is the Littlefield Fire Department.

5- We used the Business Search at <http://www.uswestdex.com>

9. *Conclusions.* Based on our research: Littlefield, Arizona has a population of 87 verified by the U.S. Census Bureau's 1990 Census, Littlefield appears to be dependent economically to nearby Mesquite which currently has two FM allotments including a vacant Class-C allotment. Our search for businesses has returned a wildlife preserve, golf course and fire department. Littlefield is already well served from stations in Mesquite, NV and St. George, UT. Based on the availability of available channels in the area, a community the size of Littlefield may be better served through a LPFM station as proposed in MM Docket 99-25. We feel that the petitioner may be using Littlefield to place a third aural service into Mesquite. For the reasons mentioned in this pleading, REC Networks and the Arizona Microradio Association are asking the Commission to DENY this petition and terminate this proceeding.

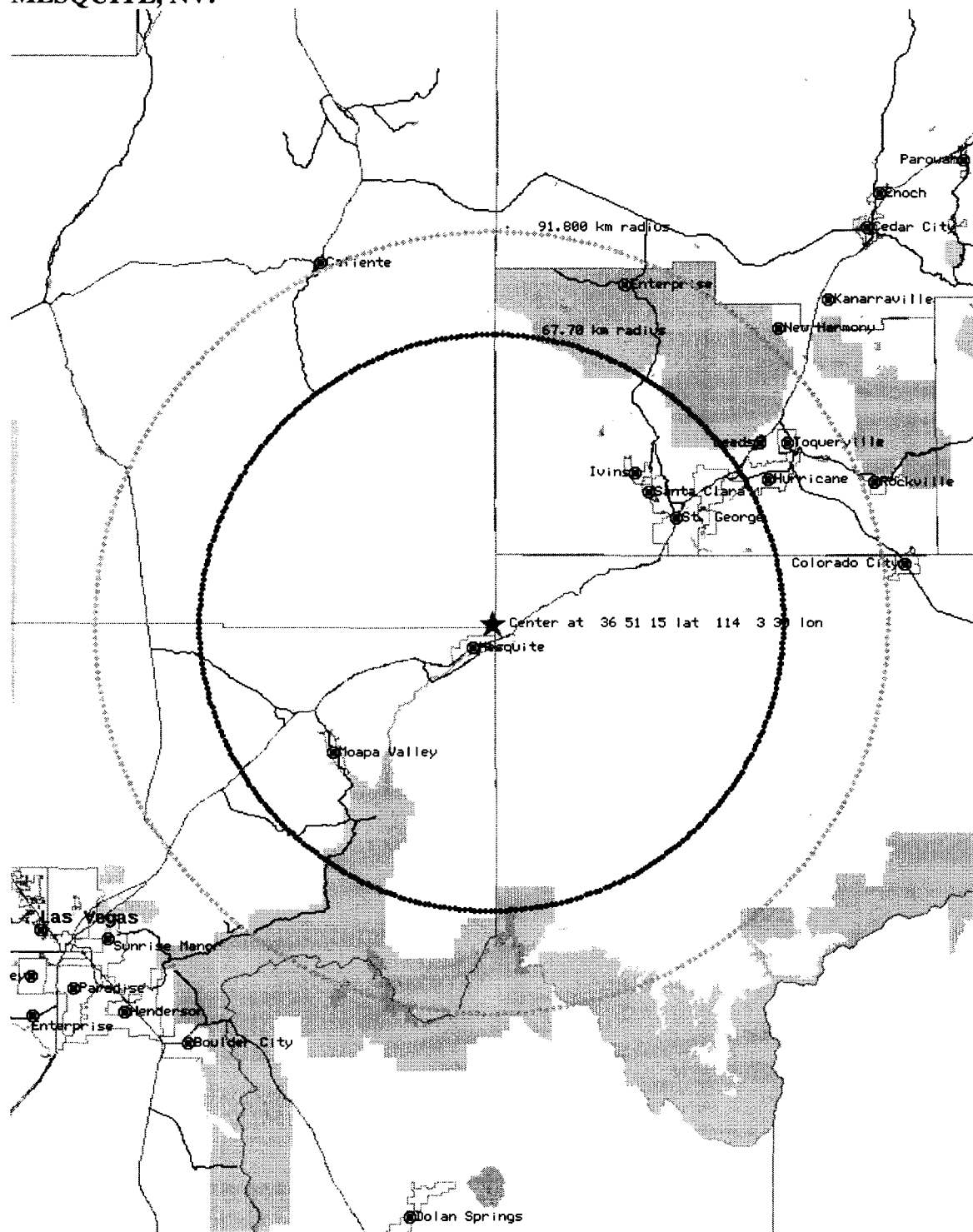
Respectfully Submitted,



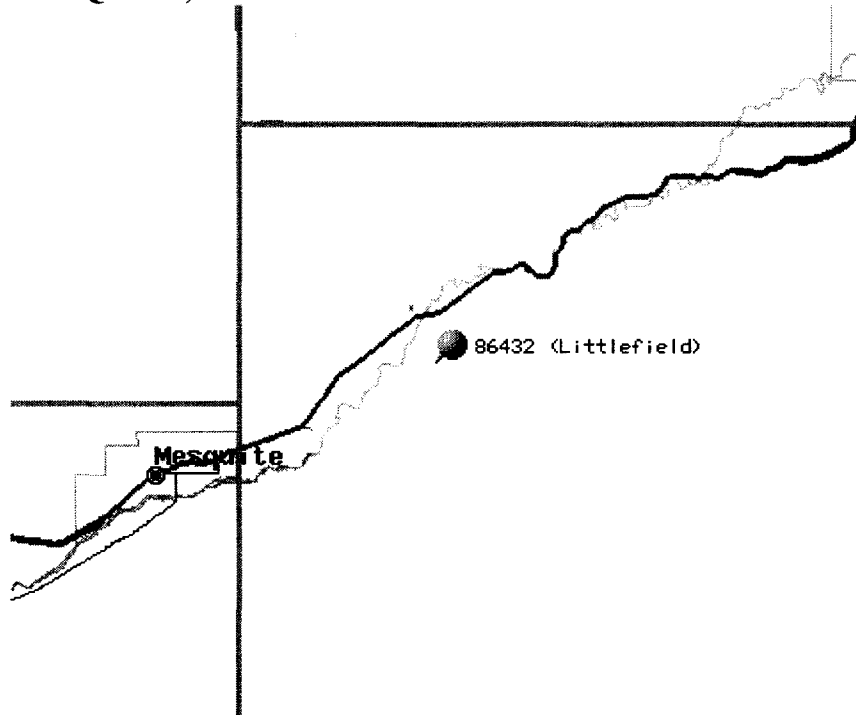
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Service via e-mail is encouraged. Please use MS Word, ASCII or PDF formats.

APPENDIX A - MAP OF THE PREDICTED 70 dBu CITY GRADE CONTOUR AND THE 60 dBu SERVICE CONTOUR OF THE VACANT CHANNEL 244C AT MESQUITE, NV.



**APPENDIX B - LOCATION OF LITTLEFIELD, AZ COMPARED TO
MESQUITE, NV.**



LEGEND

- | | |
|-------------------|-----------------|
| — State | ▨ Military Area |
| — County | ▨ National Park |
| ▨ Lake/Pond/Ocean | □ City |
| — Expressway | — County |
| — Highway | |
| — Connector | |
| ▨ Stream | |

Scale 1:365065 0 2 4 6 8 10 mi
0 5 10 15 20 km
*average--true scale depends on monitor resolution

CERTIFICATE OF SERVICE

A copy of this pleading has been served via US Mail upon the petitioner.

Mountain West Broadcasting
c/o Victor A. Michael, Jr.
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